

*File
Parking File*

Mr. Frank R. Carlucci
Associate Director, Office of
Management and Budget
Washington, D. C. 20503

Dear Mr. Carlucci:

The Director has asked me to reply to your memorandum of April 7, 1972, requesting our comments on a draft Office of Management and Budget Circular being considered for adoption as policy applicable to Federal employee parking facilities.

The subject of parking facilities commensurate with the efficient conduct of our operations continues to be of utmost concern to this Agency. We have been working with the General Services Administration (GSA) for many years to ensure that such facilities contribute to employee productivity at minimal cost and are consistent with the availability of public transportation as well as environmental considerations. In view of this, we have reviewed the Circular draft with interest.

It is foreseen that a policy and program to further the principles of standardized, equitable parking space acquisition, assignment, and cost will do much to increase the efficiency of those Federal elements located in congested urban areas of high-traffic density, as in cities such as New York and San Francisco, where the competition and costs for parking are greatest, and where adequate, high-volume mass transit systems are now in operation. Further, substantial benefits should also be attainable in the future when comprehensive mass transit systems now being developed, such as the Metro in the District of Columbia, are completed and placed in operation in other congested urban localities.

However, we do not agree that the policy outlined in the draft Circular should apply to those areas where congested conditions and high-traffic conditions do not prevail or where adequate, high-volume mass transit systems are not yet available. Many Federal elements, such as our headquarters offices in the vicinity of McLean, Virginia, are situated in suburban, or semi-rural outlying localities surrounded by extensive, open countryside acreage. Urban congestion and high-traffic density do not exist and, as a result, assessing employees for parking is not an accepted practice in such

localities, either on the part of local governments or the private sector. It is not believed that parking assessments in such cases will bring about the ultimate objectives of the draft Circular, i. e., reduce congested traffic and environmental pollution. Conversely, it will serve to build up employee resentment of a procedure which would be abnormal for suburban and semi-rural localities.

An example of a congested urban area where we believe that the stated objectives of the draft Circular also could not be achieved for a number of years, and its application now would be untimely, is the high-rise, urban Rosslyn area. It is standard practice for Government and commercial employees in that area to rent their own parking spaces and employees of this Agency pay up to \$30 per month on a lease basis. At such time as the mass, rapid transit, Metro system begins to operate in Rosslyn, a uniform policy on parking charges may then serve to encourage the use of that system in Rosslyn as well as the District of Columbia. At this time, however, it would have no appreciable effect in Rosslyn due to the inadequacy of the existing, low-volume public bus transportation.

Accordingly, it is suggested that the proposed policy, if adopted, be established on a selective basis for application only where it is clearly evident that adequate mass transit is available, and where congestion and traffic density exist to the extent that employee parking assessments are a practicable, acceptable, necessary step. Further, it is suggested that any programs which stem from this policy be monitored at frequent intervals to assure that they have resulted in an actual benefit to the locality involved in terms of increased use of mass transit, and reduced traffic congestion and environmental pollution.

Inasmuch as GSA possesses the responsibility for most of our facilities, including site location, acquisition, and construction, as well as building operation and maintenance, we will continue to rely on that agency for guidance in ensuring compliance with your standards in the area of employee parking facilities. At the same time, we will cooperate on a mutual basis so that in working together we can back our commitment to Federal policies and goals.

If this Agency can be of any further assistance in this matter, please let me know.

Sincerely,

John W. Coffey
Deputy Director
for Support